

## PAWAR LAW GROUP P.C.

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### NEW JERSEY OFFICE:

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February 18, 2016

**BY ECF**

The Honorable Shira A. Scheindlin  
United States District Judge

Re: *DeLeon v. Pichardo and Delacruz*, 15 CV 9804 (SAS)

Dear Judge Scheindlin:

We represent the plaintiff in this action. For the reasons set forth below, plaintiff respectfully requests that the Court remove this case from the “1983 Plan” and schedule an initial conference. From our previous dealings with the Law Department it is highly doubtful that they will consent to this request. We believe that neither the Court nor the parties will benefit by the instant matter remaining in the “Plan.” The issues are limited and the need for discovery greatly curtailed.

This morning we filed an amended complaint which narrowed the issues and eliminated causes of action. More importantly, we have dismissed the claims against the City and intend to move forward with claims solely against the two named individual defendants.<sup>1</sup> These two defendants were served with a summons on February 16, 2016 and presumably will be contacting the Law Department to represent them in this action.

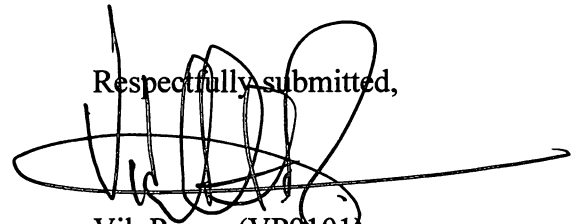
In addition, the Law Department already has all the arrest paperwork and sealed documents that are normally required. This is a straightforward case where discovery will be minimal and the disputed factual issues would be decided by the trier of the facts.

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<sup>1</sup> Upon information and belief these two defendants appear to be the only proper defendants at this time.

We believe that this case should be removed from the “Plan” and the matter set down for a initial conference with a short discovery period, and ultimately for a short 1-2 day trial.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Vik Pawar', written over a horizontal line.

Vik Pawar (VP9101)

Robert Blossner (RB0526)

Cc: Mr. Joseph Guttman, Esq. (jgutmann@law.nyc.gov)  
*Assistant Corporation Counsel*